



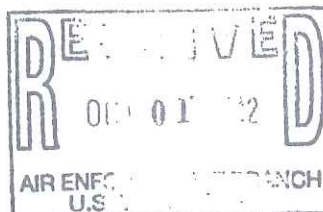
General Iron Industries, Inc.

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WACO
response
#36

September 26, 2012

Mr. Valeriy Brodsky
Permit Engineer
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, IL 62702



Re: Permit Modification Request
General Iron Industries, Inc.
1909 N. Clifton Avenue
Chicago, Illinois
I.D. No.: 031600BTB



Dear Mr. Brodsky:

On behalf of General Iron Industries, Inc. (General Iron), please allow the following correspondence to serve as General Iron's formal request to incorporate additional air pollution control equipment into the referenced facility's current Illinois EPA Operating Permit.

General Iron currently operates a metal shredder with air emissions controlled by a water suppression system (average flow rate greater than 20 gallons per minute) in accordance with an Illinois EPA Operating Permit issued September 1, 2004. In an effort to provide additional control of particulate matter emissions, General Iron plans to install an additional air pollution capture and control system (high-efficiency filter system), as a complement to the water suppression system.

According to *Title 35 of the Illinois Administrative Code (IAC) Section 201.146 Exemptions from State Permit Requirements (hhh)*, construction or operating permits are not required for replacement or addition of air pollution control equipment for existing emission units in circumstances where:

- 1) The existing emission unit is permitted and has operated in compliance for the past year;
- 2) The new control equipment will provide equal or better control of the target pollutants;
- 3) The new control device will not be accompanied by a net increase in emissions of any non-targeted criteria air pollutant;
- 4) Different State or federal regulatory requirements or newly proposed regulatory requirements will not apply to the unit; and

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- 5) Where the existing air pollution control equipment had required monitoring equipment, the new air pollution control equipment will be equipped with the instrumentation and monitoring devices that are typically installed on the new equipment of that type.

In accordance with our discussions and following a thorough review of 35 IAC 201.146, General Iron believes that the high-efficiency filter system is exempt from Illinois EPA permit requirements based on the fact that 1) the metal shredder is permitted and has operated in compliance with its current Illinois EPA Operating Permit for the past year, 2) the addition of the high-efficiency filter system will provide better control of particulate matter from the metal shredder, 3) the addition of the high-efficiency filter system will not be accompanied by a net increase in emissions of any non-targeted criteria air pollutant, 4) different State or federal regulatory requirements or newly proposed regulatory requirements will not apply to the unit, and 5) the existing shredder water suppression system does not require emission monitoring equipment.

While the high-efficiency filter system is believed to be exempt from Illinois EPA permit requirements, General Iron is nevertheless requesting that its State Operating Permit be modified to include the proposed system in the permitted list of emission units and emission control devices. For your reference, the proposed high-efficiency filter system is comprised of a capture hood which measures approximately 13'4" x 15'2" x 4'0" high, a cyclone which will measure approximately 43'4" high x 10'6" in diameter and a roll-media filter box which will measure approximately 17'10" x 6'1" x 19'8" high. A fan powered by an 800-h.p. motor will direct air emissions from the shredder through the high-efficiency filter system at a maximum design capacity of approximately 70,000 cubic feet per minute.

Should you have any questions or need any additional information to modify General Iron's Illinois EPA Operating Permit, please feel free to contact me at 847-508-9170. Thank you for your courtesies and cooperation with this filing.

Respectfully submitted,



Jim Kallas

cc: U.S. EPA, Region 5